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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	
v.)	No. 07 CR 457
)	
MICHAEL J. MAHONEY)	Judge James B. Zagel
)	

AGREED PROTECTIVE ORDER

The government has filed an agreed motion for a protective order. The government's motion is GRANTED, and it is hereby ORDERED as follows:

1. All materials produced by the government in preparation for, or in connection with, any stage of the proceedings in this case, including but not limited to grand jury transcripts, agency reports, witness statements, memoranda of interview, copies of agency files, bank and other financial records, and any other documents and tangible objects produced by the government, shall be covered by this Order.

2. All materials produced by the government remain the property of the United States. Upon conclusion of the trial and any appeals of this case or the earlier resolution of charges against the defendant, materials produced in discovery and all copies made thereof shall either be destroyed or maintained under secure conditions by defense counsel, unless there is a specific request by the government for the return of particular documents.

3. Any discovery material provided by the United States may be used by defendant and his counsel solely in connection with the defense of this case and for no other purpose. Neither discovery materials, nor any of their contents, shall be disclosed either directly or indirectly to any person or entity other than the defendant, employees of defense counsel's firm, persons assisting in the defense, persons who are interviewed (as potential witnesses) or consulted (as potential experts)

during the course of the preparation for trial of this case, or such other persons as to whom the Court may authorize disclosure.

4. Discovery may be reproduced in compliance with this Order, but steps shall be taken to remove personal identifying information from any copies disseminated in compliance herewith.

5. The restrictions set forth in this order do not apply to documents that are (or become) public record, including but not limited to, trial transcripts, documents that have been received in evidence at other trials, or documents that are otherwise properly placed in the public domain. Personal identifying information will be removed from discovery before any such material is publicly filed with the Clerk, and documents such as birth certificates and baptism certificates shall not be placed in the public domain, except as necessary when used as exhibits at trial.

6. The parties are ordered to retain copies of all documents that are provided in discovery under the Protective Order. Documents or portions of documents produced in discovery that require the Court's review and contain personal identifying information shall be submitted with the personal identifying information redacted by the submitting party. The producing party shall maintain the original documents intact for any further review. A redacted copy of the pleading shall be filed with the Clerk of Court for the record. Any document the government expressly and specifically identifies to defense counsel as otherwise confidential, shall be submitted to chambers *in camera* in a sealed envelope bearing the caption of the case, case number, the title of the motion or response to which the submitted information pertains, and the name and telephone number of counsel submitting the documents.

7. Each party reserves all other rights relating to discovery and the production of documents, including the right to petition the Court to construe, modify, or enforce this Order upon proper notice. The Court retains jurisdiction to resolve any disputes regarding this Order.

ENTER:


James B. Zagel
United States District Judge

Date: 19 Feb 2008